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May 7, 2024

VIA EMAIL and CERTIFIED MAIL, RETURN RECEPT REQEUSTED SUBJECT TO RULE 408/FOR SETTLEMENT PURPOSES ONLY

Michael Ivey 1350 Goldsmith Drive Westerville, OH 43081 michaelivey@mac.com

RE: Our Client: American Brother Foundation
"We Came In Peace"

Dear Mr. Ivey:

Taft Stettinius & Hollister LLP represents American Brother Foundation, Inc ("ABF"). We are reaching out to you today with respect to "We Came in Peace" (the "Documentary"), a film that our client engaged you to create about four years ago under an agreement that included certain understandings, rights afforded to our client, and obligations to you.

Among other things, the parties discussed and agreed that the finished Documentary would be donated to the US Marine Corps Museum. We believe that you are not, and have not been, acting in accordance with those understandings. In addition, we also believe that you do not intend to do so in the future. Our client has paid you nearly a quarter of a million dollars to date, and not only has it not seen a completed Documentary, but is now faced with an ongoing effort to enforce its rights and expectations under the agreement.

Our client's preference is to resolve these issues and move forward with the completion of the Documentary in a manner aligned with its original expectations and agreement. However, as ABF has made efforts to do so in the past with no success, ABF has now engaged our firm to litigate this matter if an amicable resolution is not reached by June 3, 2024.

In short, time is running out, and the Documentary needs to be completed. We believe that it is in both party's best interest to do so. However, our client must enforce its own rights and obligations with respect to the Documentary. It will not hesitate further to initiate litigation if necessary.

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Our client demands that the parties enter into a written agreement governing the parties rights and obligations regarding to the Documentary to date and going forward. The agreement would contain the following material terms, among others:

- 1. You will complete the film by October 1, 2024.
- 2. ABF will own all hardware and supplies purchased paid for by ABF for use in connection with the Documentary.
- 3. You will provide a schedule of work and a monthly report of work completed to ABF within 10 days following the end of each calendar month.
- 4. ABF will have the right to maintain, control, use, and license the raw footage of 90-plus interviews and the right to determine the disposition of the raw footage, interviews, and film; e.g. where it will reside or will be stored after completion.
- 5. ABF will have the right to approve all distributors and exhibitors of the finished Documentary (e.g. Netflix, PBS, etc.).
- 6. You will agree to provide credit in a mutually agreeable form for USMC Sgt. Mecot Camara and USMC General Al Gray and all Marines that are no longer with us that served in Beirut from 82-84, as well as American Brother Foundation.
- 7. ABF will also have a right to approve the initial screenings of the completed Documentary as to date and location and will be afforded the right to control a portion of the tickets (e.g. the right to allocate the opportunity to attend to the relevant community and stakeholders).
- 8. Payment terms, including a fees, expense budget, and timeline for payment.

Please advise, no later than May 14, 2024, if you are interested in a path to resolution that includes a written agreement as outlined above. If not, unfortunately, our client believes that litigation will be its only remaining option, which will not only be costly to both parties, but will result in significant delays in the completion of the Documentary.

I look forward to hearing from you (or your attorney if you have engaged one) in the very near future with the hopes of reaching resolution to this matter.

Please feel free to contact me if you would like to discuss this matter further.

Best Regards,

Taft Stettinius & Hollister LLP

Leon D. Bass, Attorney